Before the COPYRIGHT ROYALTY JUDGES Washington, D.C.

RECEIVED
Public Information Office

JAN 06 2014

COPYRIGHT OFFICE

In the Matter of		Docket No. 2012-6 CRB CD 2004-2009
Distribution of the 2004, 2005, 2006, 2007, 2008, and 2009 Cable Royalty Funds)))	(Phase II)

ADDENDUM TO SETTLEMENT REPORT AND NOTICE OF REMAINING CONTROVERSY IN PHASE II SPORTS CATEGORY

The Joint Sports Claimants ("JSC") hereby submit the following additional information in accordance with the Copyright Royalty Judges' ("Judges") *Notice of Participants, Commencement of Voluntary Negotiation Period, and Case Scheduling Order*, Docket No. 2012-6 CRB CD 2004-2009 (Phase II) (Sept. 23, 2013). As an addendum to JSC's "Settlement Report and Notice of Remaining Controversy in Phase II Sports Category" (filed Jan. 2, 2014), JSC hereby provides the following details of the remaining controversies in the Phase I Sports category:

Independent Producers Group ("IPG")

Counsel of record: Brian D. Boydston, Pick & Boydston LLP, 10786 Le Conte Avenue, Los Angeles, CA 90024

<u>Nature of Controversy</u>: Validity of claims, categorization of claims, amount in controversy, and distribution methodology. JSC's understanding is that IPG is pressing claims on behalf of Fédération Internationale de Football Association ("FIFA") and United States Olympic Committee, both of which were rejected in the 2000-03 Phase II proceeding.

Estimate of value of claims: JSC does not believe that IPG has any valid claim to 2004-2009 Sports royalties and has not estimated the value of the programming for which IPG has improperly made a claim.

<u>Legal and factual issues</u>: validity of claims (whether IPG has the authority to represent FIFA), categorization of claims (whether any of the IPG claims belongs in the Phase I Sports category), and distribution methodology

David Powell

Counsel of record: pro se

Nature of controversy: amount and validity of claims and distribution methodology

Estimate of value of claims: JSC is not aware of any specific program for which Mr. Powell has the rights to claim copyright royalties, and as such, JSC believes that his claims have no value.

Legal and factual issues: validity of claims and distribution methodology

Further proceedings will be necessary to make a final determination of the proper distribution of the 2004-2009 Funds with respect to the three parties that have asserted claims against the Phase I Sports category. For the reasons previously referenced, JSC asks that the Judges stay those further proceedings in the Phase I Sports category until the U.S. Court of Appeals for the District of Columbia Circuit resolves similar issues related to the 2000-03 Phase II proceeding. JSC also asks that any further proceedings in the Sports category be resolved via paper proceedings, and JSC intends to participate fully in any such further proceedings.

Respectfully submitted,

JOINT SPORTS CLAIMANTS

Robert Alan Garrett

D.C. Bar No. 239681

Stephen K. Marsh

D.C. Bar No. 470365

ARNOLD & PORTER LLP

555 Twelfth Street, N.W.

Washington, D.C. 20004-1206

Telephone: (202) 942-5000

Fax: (202) 942-5999

robert.garrett@aporter.com stephen.marsh@aporter.com

January 6, 2014

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2014, a copy of the foregoing motion was sent by Federal Express standard overnight mail or priority overnight mail to the parties listed below:

MPAA-REPRESENTED PROGRAM SUPPLIERS

Gregory O. Olaniran Lucy Holmes Plovnick MITCHELL SILBERBERG & KNUPP LLP 1818 N Street, NW, 8th Floor Washington, DC 20036

CERTAIN DEVOTIONAL CLAIMANTS

Clifford H. Harrington PILLSBURY WINTHROP SHAW PITTMAN LLP P.O. Box 57197 Washington, D.C. 20036-9997

BILLY GRAHAM EVANGELISTIC ASSOCIATION

Edward S. Hammerman Hammerman PLLC dba Intermediary Copyright Royalty Services 5335 Wisconsin Avenue NW, #440 Washington, DC 20015-2054

NATIONAL ASSOCIATION OF BROADCASTERS

John I. Stewart, Jr. Crowell & Moring LLP 1001 Pennsylvania Avenue NW Washington, DC 20004

DAYSTAR TELEVISION NETWORK

Gregory H. Guillot Gregory H. Guillot, P.C. 13455 Noel Road, #1000 Dallas, TX 75240

DAVID POWELL

P.O. Box 010950 Miami, FL 33101

James R. Wood

Before the COPYRIGHT ROYALTY JUDGES Washington, D.C.



In the Matter of)	IAN 62014
Distribution of 2004-2009)	Docket No. 2012-6 CRB CD, 2004-2009 (Nesse 2)
Cable Royalty Funds)	(Phase 2)

INDEPENDENT PRODUCERS GROUP'S NOTICE OF CONTROVERSY

Worldwide Subsidy Group LLC (a Texas limited liability company) dba Independent Producers Group ("IPG"), hereby provides the attached Notice of Controversy regarding the distribution of funds in the above-captioned proceedings.

IPG maintains claims in the Devotional, Program Suppliers and Sports Programming categories.

Devotional Programming:

In the Devotional Programming category, the following entities filed petitions to participate: Independent Producers Group, Settling Devotional Claimants, Billy Graham Evangelistic Association, National Association of Broadcasters, and Word of God Fellowship dba Daystar Television Network. On information and belief, IPG understands that the National Association of Broadcasters has settled and withdrawn its claims.

Settling Devotional Claimants:

Counsel of Record: Clifford Harrington, Esq., Pillsbury, Winthrop et al., P.O.

Box 57197, Washington, D.C. 20036-9997

Nature of Controversy: amount and validity of claims and distribution methodology.

Estimate of Value of Claims: unknown at this time.

Legal and Factual Issues: validity of claims and distribution methodology.

Billy Graham Evangelistic Association:

Counsel of Record: Edward Hammerman, Hammerman PLLC, 5335 Wisconsin

Ave. NW, #440, Washington, D.C. 20015-2054

Nature of Controversy: amount and validity of claims and distribution

methodology.

Estimate of Value of Claims: unknown at this time.

Legal and Factual Issues: validity of claims and distribution methodology.

Word of God Fellowship dba Daystar Television Network:

Counsel of Record: Gregory Guillot, Gregory Guillot, P.C., 13455 Noel Road,

#1000, Dallas, TX 75240

Nature of Controversy: amount and validity of claims and distribution

methodology.

Estimate of Value of Claims: unknown at this time.

Legal and Factual Issues: validity of claims and distribution methodology.

Program Suppliers:

In the Program Suppliers category, the following entities filed petitions to participate: Independent Producers Group, Motion Picture Association of America, and David Powell.

Motion Picture Association of America:

Counsel of Record: Gregory Olanarin, Mitchell, Silberburg, et al., 1818 N Street, N.W., 8th Floor, Washington, D.C. 20036

Nature of Controversy: amount and validity of claims and distribution methodology.

Estimate of Value of Claims: unknown at this time.

Legal and Factual Issues: validity of claims and distribution methodology.

David Powell:

Counsel of Record: Pro Se, P.O. Box 010950, Miami, FL 33101

Nature of Controversy: amount and validity of claims and distribution

methodology.

Estimate of Value of Claims: unknown at this time.

Legal and Factual Issues: validity of claims and distribution methodology.

Sports Programming:

In the Sports Programming category, the following entities filed petitions to participate: Independent Producers Group and the Joint Sports Claimants. The parties have jointly submitted to the Judges a Motion to Stay the proceedings pending resolution of an appeal of the 2000-2003 cable royalty proceedings (Phase II). Notwithstanding the foregoing, the following is the information requested by the Judges:

Joint Sports Claimants:

Counsel of Record: Robert Garrett, Arnold & Porter LLP, 555 Twelfth Street,

N.W., Washington, D.C. 2004-1206

Nature of Controversy: amount and validity of claims and distribution

methodology.

Estimate of Value of Claims: unknown at this time.

Legal and Factual Issues: validity of claims and distribution methodology.

Respectfully submitted,

Dated: January 3, 2014

Brian D. Boydston, Esq.

California State Bar No. 155614

PICK & BOYDSTON, LLP 10786 Le Conte Ave.

Los Angeles, California 90024

Telephone:

(213)624-1996

Facsimile:

(213)624-9073

Email: brianb@ix.netcom.com

Attorneys for Independent Producers

Group

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January 2014, a copy of the foregoing was sent by overnight mail to the parties listed on the attached Service List.

Brian D. Boydston, Esq.

JOINT SPORTS CLAIMANTS

Robert Alan Garret, Esq. Stephen K. Marsh Arnold & Porter LLP 555 Twelfth Street, NW Washington, D.C. 20004-1206

MPAA REPRESENTED PROGRAM SUPPLIERS

Gregory O. Olaniran, Esq. Lucy Holmes Plovnick. Esq. Mitchell, Silberberg & Knupp LLP 1818 N Street, N.W., 8th Floor Washington, D.C. 20036-9997

SETTLING DEVOTIONAL CLAIMANTS

Clifford H. Harrington Pillsbury Winthrop et al. P.O. Box 57197 Washington, D.C. 20036-9997

BILLY GRAHAM EVANGELISTIC ASSOCIATION

Edward Hammerman Hammerman PLLC dba Intermediary Copyright Royalty Services 5335 Wisconsin Avenue NW, #440 Washington, D.C. 20015-2054

NATIONAL ASSOCIATION OF BROADCASTERS

John I. Stewart, Jr., Esq. Crowell & Moring LLP 1001 Pennsylvania Ave., NW Washington, D.C. 20004-2595

DAYSTAR TELEVISION NETWORK

Gregory H. Guillot, P.C. 13455 Noel Road, #1000 Dallas, TX 75240

DAVID POWELL

P.O. Box 010950 Miami, FL 33101 English

Customer Service

USPS Mobile

Register / Sign In



Search USPS.com or Track Packages

Quick Tools Track

Enter up to 10 Tracking #' Find Find USPS Locations Educations Educations Educations Educations Educations Educations Charles Educations Edu Ship a Package

Send Mail

Manage Your Mail

Shop

Business Solutions



Customer Service > Have questions? We're here to help.

Change of Address

Tracking Number: EU947682995US

Scheduled Delivery Date: January 6, 2014, 3:00 pm

Money Back Guarantee Signed for By: M WALLS // WASHINGTON, DC 20024 // 11:18 am

Product & Tracking Information

Postal Product:

DATE & TIME

Priority Mail Express 2-Day™

\$100 insurance included

PO to Addressee

WASHINGTON, DC 20024

WASHINGTON, DC 20024

WASHINGTON, DC 20074

WASHINGTON, DC 20074

LOS ANGELES, CA 90009

LOS ANGELES, CA 90009

LOS ANGELES, CA 90045

LOS ANGELES, CA 90045

WASHINGTON, DC 20024

January 6, 2014, 10:37

January 6, 2014, 11:18

January 6, 2014, 8:41 am

January 6, 2014 Facility

Processed through January 6, 2014, 3:56 am

January 4, 2014

January 4, 2014, 10:49

January 4, 2014, 6:38 pm

January 4, 2014, 11:13

Features:

STATUS OF ITEM LOCATION

Delivered

Sorting Complete

Arrival at Post Office

Depart USPS Sort

USPS Sort Facility

Depart USPS Sort Facility

Processed at USPS Origin Sort Facility

Dispatched to Sort

Facility

Acceptance

Available Options

Proof of Delivery

Email Updates

Track Another Package

What's your tracking (or receipt) number?

Track It

LEGAL

Privacy Policy > Terms of Use > FOIA > No FEAR Act EEO Data > ON USPS.COM

Government Services > Buy Stamps & Shop > Print a Label with Postage Customer Service >

ON ABOUT.USPS.COM About USPS Home >

Newsroom > USPS Service Alerts > Forms & Publications > OTHER USPS SITES Business Customer Gateway > Postal Inspectors > Inspector General > Postal Explorer >